

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

BRUNO HOFMANN, Individually And On Behalf Of  
All Others Similarly Situated,

Plaintiff,

vs.

PHILIP LAUGHLIN, MICHAEL SABOLINSKI,  
ALBERT ERANI, DONNA ABELLI LOPOLITO,  
JOHN J. ARCARI, HERBERT M. STEIN, ALAN  
ADES, BERNARD A. MARDEN, ALAN W. TUCK,  
NOVARTIS PHARMA AG, and PRICE  
WATERHOUSECOOPERS LLP,

Defendants.

Case No.: 1:04cv10027-JLT  
DISTRICT COURT  
DISTRICT OF MASS

**ORAL ARGUMENT REQUESTED**

**PLAINTIFFS' MOTION TO STRIKE DEFENDANT  
PRICEWATERHOUSECOOPERS LLP'S MOTION TO DISMISS**

Proposed lead plaintiffs Bruno Hofmann, John H. Bowie, Richard Madigan, and Richard Conen (collectively, "Plaintiffs" or "Movants"), by their counsel, hereby move this Court to strike defendant PricewaterhouseCoopers LLP's Motion to Dismiss, dated March 29, 2004, without prejudice, or, in the alternative, for twenty (20) days to respond thereto on the merits if Plaintiffs' Motion to Strike is not granted. The grounds for Plaintiffs' Motion to Strike are set forth in the accompanying memorandum of law.

**REQUEST FOR ORAL ARGUMENT**

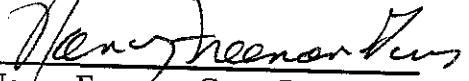
Movants respectfully request oral argument on this motion.

DATED: April 12, 2004

Respectfully Submitted,

**MOULTON & GANS, P.C.**

By:

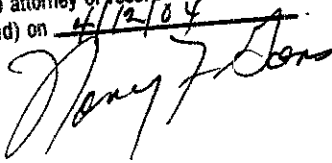
  
Nancy Freeman Gans, BBO #184540

33 Broad Street  
Suite 1100  
Boston, MA 02109  
(617) 369-7979

**Proposed Liaison Counsel for proposed lead  
plaintiffs Bruno Hofmann, John H. Bowie,  
Richard Madigan, and Richard Conen**

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was  
served upon the attorney of record for each party  
by mail (by hand) on 4/12/04



**MILBERG WEISS BERSHAD HYNES  
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**Proposed Lead Counsel for proposed lead  
plaintiffs Bruno Hofmann, John H. Bowie,  
Richard Madigan, and Richard Conen**